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Nevada Department of Corrections and James
Dzurenda*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DAWNYELL FLYNN, an individual,
Plaintiff,

vs.

STATE OF NEVADA ex rel. NEVADA
DEPARTMENT OF CORRECTIONS, a
public entity of the State of Nevada;
DONALD BURSE, an individual; JAMES
DZURENDA, director, in his official
capacity; and Doe Nevada Department of
Corrections Employees 1-10, in their
individual and official capacities,
Defendants.

Case No. 2:22-cv-01753-JAD-NJK

**STIPULATION AND ORDER TO
EXTEND DEFENDANTS STATE OF
NEVADA ex rel. NEVADA
DEPARTMENT OF CORRECTIONS
AND JAMES DZURENDA'S
RESPONSE TO PLAINTIFF'S
MOTIONS TO COMPEL AND
MOTION IN LIMINE
(FIRST REQUEST)**

ECF No. 105

IT IS HEREBY STPULATED between Plaintiff Dawnyell Flynn, Defendants, Nevada Department of Corrections and James Dzurenda, in his official capacity (collectively "State Defendants"), by and through their respective counsel of record, hereby jointly stipulate and agree to extend the time for Defendants to file oppositions to Plaintiff's Renewed Motion to Compel Defendants to Respond to Plaintiff's First, Second, and Third Set of Requests for Production of Documents and Second Set of Interrogatories (ECF No. 102), which is currently due July 14, 2025 and Plaintiff's Motion in Limine to Exclude

1 Expert Witness Testimony of Stanley Kephart Under Federal Rule of Evidence 702 (ECF
2 No. 103), which is currently due July 17, 2025, up to and including July 21, 2025.

3 The Motion to Compel has been recently impacted by separate criminal proceedings.
4 Last week, Defendant Burse entered a guilty plea which has altered the analysis of
5 documents and information being withheld by NDOC which may reduce the scope of the
6 dispute among the parties relevant to the Motion to Compel. NDOC intends to release
7 additional documents in the coming days pursuant to the resolution of Defendant Burse's
8 criminal proceedings.

9 The Motion to Exclude Stanley Kephart raises multiple issues and arguments, and
10 Defendants seek additional time to address them in full prior to filing.

11 Additionally, the during the intervening time since each Motion was filed, there was
12 a federal holiday weekend and the supervising attorney on this matter had a separate
13 family vacation over several days the week of July 7. This has further delayed the ability
14 of Defendants to prepare oppositions to each motion.

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Based on the foregoing and for good cause appearing, the parties, through their counsel, hereby stipulate and agree to extend the time to file oppositions to the Plaintiffs' pending Motions to July 21, 2025.

IT IS SO STIPULATED.

DATED this 14th day of July, 2025.

DATED 14th day of July, 2025.

AARON D. FORD
Attorney General

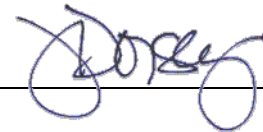
SGRO & ROGER

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*Attorneys for Defendants State of
Nevada ex rel. Nevada Department of
Corrections and James Dzurenda*

IT IS SO ORDERED.



7/15/25